

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**FEE APPLICATION COVER SHEET FOR THE**  
**PERIOD OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

IN RE: CYXTERA TECHNOLOGIES, INC., et al. APPLICANT: Pachulski Stang Ziehl & Jones LLP

CASE NO.: 23-14853 (JKS) CLIENT: Official Committee of Unsecured Creditors

CHAPTER: 11

CASE FILED: June 4, 2023

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SECTION I  
FEE SUMMARY

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	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested:	\$925,543.00	\$9,081.73
Total Fees Allowed To Date:	\$740,434.40	\$9,081.73
Total Retainer (If Applicable):	N/A	N/A
Total Holdback (If Applicable):	\$185,108.60	\$0.00
Total Received By Applicant:	\$740,434.40	\$9,081.73

NAME OF PROFESSIONAL	YEAR ADMITTED	TITLE/DEPARTMENT	HOURS	RATE	Fee
Robert J. Feinstein	1982	Partner / Bankruptcy	0.90	\$1,695.00	\$ 1,525.50
Bradford J. Sandler	1996	Partner / Bankruptcy	15.40	\$1,595.00	\$24,563.00
Gabriel I. Glazer	2006	Partner / Bankruptcy	0.10	\$1,325.00	\$ 132.50
Paul J. Labov	2002	Partner / Bankruptcy	27.20	\$1,295.00	\$35,224.00
Zev M. Bomrind	1997	Partner / Corporate, Securities, Transactional	7.30	\$1,295.00	\$ 9,453.50
Colin R. Robinson	2001	Counsel / Bankruptcy	0.70	\$1,095.00	\$ 766.50
Cia H. Mackle	2006	Counsel / Bankruptcy	0.60	\$ 925.00	\$ 555.00
Edward A. Corma	2018	Associate/ Bankruptcy	0.70	\$ 725.00	\$ 507.50
La Asia S. Carty	N/A	Paralegal / Bankruptcy	8.20	\$ 545.00	\$ 4,469.00
<b>Total Fees</b>			<b>61.10</b>		<b>\$77,196.50</b>
<b>Attorney Blended Rate</b>					<b>\$1,263.45</b>

FEE TOTALS - PAGE 2 **\$77,196.50**

DISBURSEMENTS TOTALS - PAGE 3 **\$ 134.31**

TOTAL FEE APPLICATION **\$77,330.81**

MINUS 20% HOLDBACK **\$15,439.30**

AMOUNT SOUGHT AT THIS TIME **\$61,891.51**

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**SECTION II - SUMMARY OF SERVICES**

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>Fee</b>
Asset Disposition	23.00	\$31,357.00
Case Administration	5.30	\$ 4,253.50
PSZJ Compensation	3.70	\$ 2,016.50
Other Professional Compensation	2.10	\$ 2,254.50
Financing/Cash Collateral/Cash Management	1.20	\$ 1,713.00
General Creditors' Committee	2.10	\$ 2,800.50
Operations	0.50	\$ 797.50
Plan and Disclosure Statement	23.10	\$31,844.50
Other Professional Retention	0.10	\$ 159.50
<b>TOTAL:</b>	<b>61.10</b>	<b>\$77,196.50</b>

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**SECTION III - SUMMARY OF DISBURSEMENTS**

<b>DISBURSEMENT</b>	<b>AMOUNT</b>
PACER - Court Research	\$ 4.10
Postage	\$ 42.81
Reproduction Expense	\$ 87.40
<b>TOTAL DISBURSEMENTS</b>	<b>\$ 134.31</b>

I certify under penalty of perjury that the foregoing is true and correct.

Dated: January 26, 2024

/s/ Colin R. Robinson

Colin R. Robinson

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Robert J. Feinstein

Bradford J. Sandler

Paul J. Labov

Colin R. Robinson

Cia Mackle

PACHULSKI STANG ZIEHL & JONES LLP

780 Third Avenue, 34<sup>th</sup> Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

rfeinstein@pszjlaw.com

bsandler@pszjlaw.com

plabov@pszjlaw.com

cmackle@pszjlaw.com

*Counsel for the Official Committee of Unsecured Creditors*

In re:

CYXTERA TECHNOLOGIES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-14853 (JKS)

(Jointly Administered)

**FOURTH MONTHLY FEE STATEMENT OF  
PACHULSKI STANG ZIEHL & JONES LLP FOR THE PERIOD  
OF OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Effective Date of Retention:	June 23, 2023
Period for Which Compensation and Reimbursement is Sought:	October 1, 2023 - October 31, 2023

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://www.kccllc.net/cyxtera>. The location of Debtor Cyxtera Technologies, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is: 2333 Ponce de Leon Boulevard, Ste. 900, Coral Gables, Florida 33134.

Compensation Sought as Actual, Reasonable and Necessary for Statement Period:	\$77,196.50
Reimbursement of Expenses Sought as Actual, Reasonable and Necessary During Statement Period:	\$134.31
Objection Deadline:	February 9, 2024
Amount Payable After Objection Deadline (80% of fees, 100% of expenses):	\$61,891.51

In accordance with the Order Pursuant to Sections 105(a) and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-3 and the Court’s *Administrative Fee Order Establishing Procedures for the Allowance and Payment of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court* entered on July 21, 2023 [Docket No. 305] (the “Administrative Order”), Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”), counsel for the Official Committee of Unsecured Creditors of the above-captioned debtors and debtors in possession, submits this Fourth Monthly fee statement (the “Fourth Monthly Fee Statement”), seeking compensation for services rendered and reimbursement of expenses incurred for the period from October 1, 2023 through October 31, 2023 (the “Statement Period”).

By this Fourth Monthly Fee Statement, PSZJ seeks payment in the amount of \$61,891.51, which is comprised of (i) eighty percent (80%) of the total amount of compensation sought for actual and necessary services rendered during the Statement Period and (ii) reimbursement of one hundred percent (100%) of actual and necessary expenses incurred in connection with such services.

Annexed hereto are (i) a copy of PSZ&J’s retention order as **Exhibit A** [Docket No. 379] and (ii) contemporaneously-maintained time and expense records for the services rendered during the Statement Period as **Exhibit B**.

**TIME SUMMARY BY BILLING CATEGORY**  
For the Period of October 1, 2023 through October 31, 2023

<b>SERVICES RENDERED</b>	<b>HOURS</b>	<b>FEES</b>
Asset Disposition	23.00	\$31,357.00
Case Administration	5.30	\$ 4,253.50
PSZJ Compensation	3.70	\$ 2,016.50
Other Professional Compensation	2.10	\$ 2,254.50
Financing/Cash Collateral/Cash Management	1.20	\$ 1,713.00
General Creditors' Committee	2.10	\$ 2,800.50
Operations	0.50	\$ 797.50
Plan and Disclosure Statement	23.10	\$31,844.50
Other Professional Retention	0.10	\$ 159.50
<b>TOTAL:</b>	<b>61.10</b>	<b>\$77,196.50</b>

**TIME SUMMARY BY PROFESSIONAL**  
For the Period of October 1, 2023 through October 31, 2023

<b>NAME OF PROFESSIONAL</b>	<b>YEAR ADMITTED</b>	<b>TITLE/DEPARTMENT</b>	<b>HOURS</b>	<b>RATE</b>	<b>FEES</b>
Robert J. Feinstein	1982	Partner / Bankruptcy	0.90	\$1,695.00	\$ 1,525.50
Bradford J. Sandler	1996	Partner / Bankruptcy	15.40	\$1,595.00	\$24,563.00
Gabriel I. Glazer	2006	Partner / Bankruptcy	0.10	\$1,325.00	\$ 132.50
Paul J. Labov	2002	Partner / Bankruptcy	27.20	\$1,295.00	\$35,224.00
Zev M. Bomrind	1997	Partner / Corporate, Securities, Transactional	7.30	\$1,295.00	\$ 9,453.50
Colin R. Robinson	2001	Counsel / Bankruptcy	0.70	\$1,095.00	\$ 766.50
Cia H. Mackle	2006	Counsel / Bankruptcy	0.60	\$ 925.00	\$ 555.00
Edward A. Corma	2018	Associate/ Bankruptcy	0.70	\$ 725.00	\$ 507.50
La Asia S. Carty	N/A	Paralegal / Bankruptcy	8.20	\$ 545.00	\$ 4,469.00
<b>Total Fees</b>			<b>61.10</b>		<b>\$77,196.50</b>
<b>Attorney Blended Rate</b>				<b>\$1,263.45</b>	

**EXPENSE SUMMARY**  
For the Period of October 1, 2023 through October 31, 2023

<b>DISBURSEMENT</b>	<b>AMOUNT</b>
PACER - Court Research	\$ 4.10
Postage	\$ 42.81
Reproduction Expense	\$ 87.40
<b>TOTAL DISBURSEMENTS</b>	<b>\$134.31</b>

**DESCRIPTION OF SERVICES PERFORMED DURING THE STATEMENT PERIOD**

During the Statement Period, the Firm, among other things:

- conferred and corresponded with various parties regarding case issues/status;
- reviewed and analyzed the Brookfield APA and related documents and conferred and corresponded with parties regarding various issues with respect to the same;
- reviewed and analyzed the NVIDIA settlement motion and conferred and corresponded with parties regarding various issues with respect to the same;
- reviewed and analyzed the Cologix sale motion and conferred and corresponded with parties regarding various issues with respect to the same;
- reviewed and analyzed revised bids and conferred and corresponded with parties regarding the same;
- maintained a memorandum of critical dates;
- maintained and updated task lists;
- prepared its third monthly fee statement;
- reviewed fee statements filed by estate professionals;
- conducted regular status calls with the Committee regarding settlement status, case status, case issues, and strategy;
- corresponded with parties regarding stub rent;
- reviewed monthly operating reports;
- conferred and corresponded with various parties regarding plan issues, confirmation, and post-confirmation issues;
- reviewed and analyzed the Plan, Disclosure Statement, and Plan Supplement; and
- drafted the GUC Trust Agreement and conferred and corresponded with various parties regarding the same.

## **NOTICE AND OBJECTION PROCEDURES**

Notice of this Fourth Monthly Fee Statement shall be given by email or hand or overnight delivery upon: (i) the Debtors, Cyxtera Technologies Inc., 2333 Ponce de Leon Boulevard, Ste. 900, Coral Gables, Florida 33134, Attn: Eric Koza ([ekoza@alixpartners.com](mailto:ekoza@alixpartners.com)) and Raymond Li ([rayli@@alixpartners.com](mailto:rayli@@alixpartners.com)); (ii) co-counsel to the Debtors, Cole Schotz P.C., Court Plaza North, 25 Main Street, Hackensack, NJ 07601, Attn: Michael D. Sirota, Esq. ([msirota@coleschotz.com](mailto:msirota@coleschotz.com)), Warren A. Usatine, Esq. ([wusatine@coleschotz.com](mailto:wusatine@coleschotz.com)), Felice R. Yudkin, Esq. ([fyudkin@coleschotz.com](mailto:fyudkin@coleschotz.com)) AND Kirkland & Ellis LLP, 601 Lexington Avenue, New York, New York 10022, Attn: Attn: Christopher Marcus, P.C. ([christopher.marcus@kirkland.com](mailto:christopher.marcus@kirkland.com)) Derek I. Hunter ([derek.hunter@kirkland.com](mailto:derek.hunter@kirkland.com)), and Nikki Gavey ([nikki.gavey@kirkland.com](mailto:nikki.gavey@kirkland.com)); (iii) The Office of the United States Trustee for the District of New Jersey, One Newark Center, Suite 2100, Newark, NJ 07102, Attn: David Gerardi, Esq. ([David.Gerardi@usdoj.gov](mailto:David.Gerardi@usdoj.gov)); (iv) counsel to the DIP Lenders and the DIP/First Lien Group, Gibson, Dunn & Crutcher LLP, 200 Park Avenue, New York, NY, 10166, Attn: Scott J. Greenberg, Esq. ([SGreenberg@gibsondunn.com](mailto:SGreenberg@gibsondunn.com)) and Steven A. Domanowski, Esq. ([SDomanowski@gibsondunn.com](mailto:SDomanowski@gibsondunn.com)); (v) counsel to the Prepetition First Lien Administrative Agent, Davis Polk & Wardwell LLP, 450 Lexington Ave., New York, NY 10017, Attn: Angela M. Libby ([angela.libby@davispolk.com](mailto:angela.libby@davispolk.com)), and David Kratzer ([david.kratzer@davispolk.com](mailto:david.kratzer@davispolk.com)); and (vi) all parties that have requested to receive notice pursuant to Bankruptcy Rule 2002 (each a “Notice Party” and collectively, the “Notice Parties”).

Objections to this Fourth Monthly Fee Statement, if any, must be served upon the Notice Parties, and Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34<sup>th</sup> Floor, New York, NY 10017, Attn: Robert J. Feinstein, Bradford J. Sandler, Paul J. Labov, and Cia H. Mackle, no later than **February 9, 2024** (the “Objection Deadline”), setting forth the nature of the objection and the specific amount of fees or expenses at issue. If no objections to this Fourth Monthly Fee

Statement are received by the Objection Deadline, the Debtors shall promptly pay PSZJ 80% of the fees and 100% of the expenses identified in this Fourth Monthly Fee Statement.

**RESERVATION OF RIGHTS**

It is possible that some professional time expended or expenses incurred by PSZJ during the Statement Period are not reflected in this Application. PSZJ reserves the right to include such amounts in future fee applications.

Dated: January 26, 2024

**PACHULSKI STANG ZIEHL & JONES LLP**

*/s/ Colin R. Robinson*

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Robert J. Feinstein  
Bradford J. Sandler  
Paul J. Labov  
Colin R. Robinson  
Cia H. Mackle  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Email: rfeinstein@pszjlaw.com  
bsandler@pszjlaw.com  
plabov@pszjlaw.com  
cmackle@pszjlaw.com

*Counsel for the Official Committee of  
Unsecured Creditors*

**EXHIBIT A**

**PSZJ RETENTION ORDER**



**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Robert J. Feinstein

Bradford J. Sandler

Paul J. Labov

Cia Mackle

PACHULSKI STANG ZIEHL & JONES LLP

780 Third Avenue, 34th Floor

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rfeinstein@pszjlaw.com

bsandler@pszjlaw.com

plabov@pszjlaw.com

cmckle@pszjlaw.com

*Proposed Counsel for the Official Committee of  
Unsecured Creditors*

In re:

CYXTERA TECHNOLOGIES, INC., *et al.*,<sup>1</sup>

Debtor.

Chapter 11

Case No. 23-14853 (JKS)

(Jointly Administered)

**ORDER AUTHORIZING AND APPROVING THE RETENTION OF  
PACHULSKI STANG ZIEHL & JONES LLP AS COUNSEL TO THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS EFFECTIVE AS JUNE 23, 2023**

The relief set forth on the following pages, numbered two (2) and three (3), is hereby **ORDERED**.

**DATED: August 8, 2023**

  
Honorable John K. Sherwood  
United States Bankruptcy Court

<sup>1</sup> A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://www.kcellc.net/cyxtera>. The location of Debtor Cyxtera Technologies, Inc.'s principal place of business and the Debtors' service address in these chapter 11 cases is: 2333 Ponce de Leon Boulevard, Ste. 900, Coral Gables, Florida 33134.



Upon consideration of the *Application of the Official Committee of Unsecured Creditors for Order, Pursuant to 11 U.S.C. §§ 328 and 1103, Fed. R. Bankr. P. 2014, and Local Rule 2014-1, Authorizing and Approving the Employment and Retention of Pachulski Stang Ziehl & Jones LLP as Counsel to the Official Committee of Unsecured Creditors Effective as of June 23, 2023* (the “Application”),<sup>2</sup> and upon consideration of the Declarations of Bradford J. Sandler and the Committee Chair filed in support of the Application; and the Court having jurisdiction to consider the Application and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, and the Court having the power to enter a final order consistent with Article III of the United States Constitution; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that the relief requested in the Application is in the best interests of the Debtors’ estates, its creditors and other parties-in-interest; and the Committee having provided adequate and appropriate notice of the Application under the circumstances; and after due deliberation and good and sufficient cause appearing therefor; and it appearing to the Court that the Application should be approved,

**IT IS HEREBY ORDERED THAT:**

1. The Application is GRANTED as set forth herein.
2. The Committee is hereby authorized to retain and employ PSZ&J as counsel to the Committee pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rule 2014, and Local Rule 2014-1, effective as of June 23, 2023.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

3. PSZ&J shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Debtors' Cases in compliance with the applicable provisions of the Bankruptcy Code, including section 330 of the Bankruptcy Code, the Bankruptcy Rules, and any applicable procedures and orders of this Court. PSZ&J also intends to make a reasonable effort to comply with the U.S. Trustee's request for information and additional disclosures as set forth in the 2013 UST Guidelines.

4. PSZ&J is authorized to render professional services to the Committee as described in the Application. PSZ&J shall make reasonable efforts to avoid unnecessary duplication of services provided by any of the Committee's other retained professionals in these Cases.

5. PSZ&J shall provide ten (10) business days' notice to the Debtors and the U.S. Trustee before any increases in the rates set forth in the Application or Sandler Declaration and shall file such notice with the Court.

6. The Committee and PSZ&J are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of this Order.

**EXHIBIT B**

**TIME AND EXPENSE DETAIL**



PACHULSKI  
STANG  
ZIEHL &  
JONES

10100 Santa Monica Blvd.  
13th Floor  
Los Angeles, CA 90067

Cyxtera Technologies O.C.C.  
Cyxtera Technologies O.C.C.

October 31, 2023  
Invoice 134559  
Client 16381.00002

RE: Committee Representation

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**STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 10/31/2023**

<b>FEES</b>	\$77,196.50
<b>EXPENSES</b>	\$134.31
<b>TOTAL CURRENT CHARGES</b>	<b>\$77,330.81</b>
<b>BALANCE FORWARD</b>	<b>\$332,761.48</b>
<b>TOTAL BALANCE DUE</b>	<b>\$410,092.29</b>

Pachulski Stang Ziehl & Jones LLP  
Cyxtera Technologies O.C.C.  
Client 16381.00002

Page: 2  
Invoice 134559  
October 31, 2023

**Summary of Services by Professional**

<u>ID</u>	<u>Name</u>	<u>Title</u>	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
BJS	Sandler, Bradford J.	Partner	1,595.00	15.40	\$24,563.00
GIG	Glazer, Gabriel I.	Partner	1,325.00	0.10	\$132.50
PJL	Labov, Paul J.	Partner	1,295.00	27.20	\$35,224.00
RJF	Feinstein, Robert J.	Partner	1,695.00	0.90	\$1,525.50
ZMB	Bomrind, Zev M.	Partner	1,295.00	7.30	\$9,453.50
CHM	Mackle, Cia H.	Counsel	925.00	0.60	\$555.00
CRR	Robinson, Colin R.	Counsel	1,095.00	0.70	\$766.50
ECO	Corma, Edward A.	Associate	725.00	0.70	\$507.50
LSC	Canty, La Asia S.	Paralegal	545.00	8.20	\$4,469.00
			61.10		\$77,196.50

Pachulski Stang Ziehl & Jones LLP  
Cyxtera Technologies O.C.C.  
Client 16381.00002

Page: 3  
Invoice 134559  
October 31, 2023

**Summary of Services by Task Code**

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
AD	Asset Disposition	23.00	\$31,357.00
CA	Case Administration	5.30	\$4,253.50
CP	PSZJ Compensation	3.70	\$2,016.50
CPO	Other Professional Compensation	2.10	\$2,254.50
FN	Financing/Cash Collateral/Cash Management	1.20	\$1,713.00
GC	General Creditors' Committee	2.10	\$2,800.50
OP	Operations	0.50	\$797.50
PD	Plan and Disclosure Statement	23.10	\$31,844.50
RPO	Other Professional Retention	0.10	\$159.50
		61.10	\$77,196.50

Pachulski Stang Ziehl & Jones LLP  
Cyxtera Technologies O.C.C.  
Client 16381.00002

Page: 4  
Invoice 134559  
October 31, 2023

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**Summary of Expenses**

<u>Description</u>	<u>Amount</u>
Pacer - Court Research	\$4.10
Postage	\$42.81
Reproduction Scan Expense - @0.10 per page	\$87.40
	<hr/> \$134.31

Pachulski Stang Ziehl & Jones LLP  
Cyxtera Technologies O.C.C.  
Client 16381.00002

Page: 5  
Invoice 134559  
October 31, 2023

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Asset Disposition</b>						
10/02/2023	BJS	AD	Various emails with A&M regarding sale issues	0.30	1,595.00	\$478.50
10/02/2023	BJS	AD	Attention to NVIDIA settlement issues	0.20	1,595.00	\$319.00
10/02/2023	BJS	AD	Review Cogolox motion and various emails with B Nakhaimousa regarding same	0.40	1,595.00	\$638.00
10/02/2023	CHM	AD	Review 9019 motion filed in case.	0.30	925.00	\$277.50
10/02/2023	PJL	AD	Attention to settlement agreement and discussion with A&M regarding same.	0.40	1,295.00	\$518.00
10/02/2023	PJL	AD	Attention to Debtor correspondence on NVIDIA Settlement.	0.20	1,295.00	\$259.00
10/02/2023	PJL	AD	Conference with A&M on NVIDIA Settlement.	0.10	1,295.00	\$129.50
10/02/2023	PJL	AD	Review pleadings for Cologix sale and discuss same with Debtors' counsel and internal team.	1.20	1,295.00	\$1,554.00
10/03/2023	BJS	AD	Review Yotta presentation/financials and various emails with A&M and with D Hunter regarding same	0.60	1,595.00	\$957.00
10/03/2023	BJS	AD	Review Brooksfield APA and various emails with Debtors regarding same and various emails with A&M regarding same	0.50	1,595.00	\$797.50
10/03/2023	BJS	AD	Review Cogolox APA and various emails with A&M regarding same	0.30	1,595.00	\$478.50
10/03/2023	GIG	AD	Review email from B. Sandler re sale process.	0.10	1,325.00	\$132.50
10/03/2023	PJL	AD	Review Company B revised Bid and discuss same with A&M.	0.50	1,295.00	\$647.50
10/03/2023	PJL	AD	Review Company A revised Asset Purchase Agreement.	1.00	1,295.00	\$1,295.00
10/03/2023	PJL	AD	Correspondence drafted to internal team regarding Company A revised Asset Purchase Agreement.	0.40	1,295.00	\$518.00
10/03/2023	PJL	AD	Review comments on Company A Revised Asset Purchase Agreement.	0.60	1,295.00	\$777.00
10/03/2023	RJF	AD	Review revised bids.	0.30	1,695.00	\$508.50

Pachulski Stang Ziehl & Jones LLP  
 Cyxtera Technologies O.C.C.  
 Client 16381.00002

Page: 6  
 Invoice 134559  
 October 31, 2023

				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/03/2023	ZMB	AD	Review Asset Purchase Agreement (1.9). Draft email to P. Labov and B. Sandler re pertinent provisions of Asset Purchase Agreement (.5)	2.40	1,295.00	\$3,108.00
10/04/2023	PJL	AD	Internal discussion on Brookfield Asset Purchase Agreement.	1.10	1,295.00	\$1,424.50
10/04/2023	PJL	AD	Discussion with Z. Bomrind and A&M on Cyxtera Asset Purchase Agreement.	0.40	1,295.00	\$518.00
10/04/2023	PJL	AD	Review Brookfield Bid Letter and internal discussion regarding same.	0.60	1,295.00	\$777.00
10/04/2023	ZMB	AD	Conferences w P. Labov and A&M re working capital and lease rejection provisions of APA and related issues.	1.20	1,295.00	\$1,554.00
10/09/2023	BJS	AD	Various emails with R Newman regarding sale and review further revised APA	0.60	1,595.00	\$957.00
10/09/2023	PJL	AD	Conference with B. Sandler regarding open issues with plan/Asset Purchase Agreement.	0.30	1,295.00	\$388.50
10/09/2023	ZMB	AD	Review Paul Weiss revised APA	0.60	1,295.00	\$777.00
10/10/2023	BJS	AD	Various emails with Committee regarding sale	0.30	1,595.00	\$478.50
10/10/2023	BJS	AD	Various emails with Z Bomrind regarding APA	0.30	1,595.00	\$478.50
10/10/2023	PJL	AD	Telephone call wth Z. Bomrind re revised APA	0.20	1,295.00	\$259.00
10/10/2023	PJL	AD	Review and discuss open issues with Brookfield Asset Purchase Agreement.	0.80	1,295.00	\$1,036.00
10/10/2023	ZMB	AD	Draft email memo to Paul Labov et al re revised APA provisions (1.6). Telephone call w P. Labov re same. (.2).	1.80	1,295.00	\$2,331.00
10/11/2023	BJS	AD	Attention to NVIDIA settlement	0.20	1,595.00	\$319.00
10/18/2023	BJS	AD	Attention to Brookfield transaction	0.30	1,595.00	\$478.50
10/19/2023	BJS	AD	Various emails with M Johnson regarding sale issues	0.10	1,595.00	\$159.50
10/20/2023	BJS	AD	Various emails with D Hunter regarding sale process	0.20	1,595.00	\$319.00
10/20/2023	PJL	AD	Review modifications to Asset Purchase Agreement and discuss same with internal team.	0.40	1,295.00	\$518.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/24/2023	BJS	AD	Attention to NVIDIA settlement	0.30	1,595.00	\$478.50
10/24/2023	PJL	AD	Review modifications to Asset Purchase Agreement and discuss same with internal team.	0.60	1,295.00	\$777.00
10/25/2023	BJS	AD	Attention to Brookfield issues	0.30	1,595.00	\$478.50
10/25/2023	PJL	AD	Review A&M correspondence regarding Asset Purchase Agreement.	0.10	1,295.00	\$129.50
10/25/2023	PJL	AD	Review changes to Asset Purchase Agreement.	0.30	1,295.00	\$388.50
10/25/2023	PJL	AD	Conference with Debtors' counsel regarding redacted settlement.	0.20	1,295.00	\$259.00
10/25/2023	ZMB	AD	Review revised APA (1) email memo to P. Labov re same.	1.30	1,295.00	\$1,683.50
10/27/2023	BJS	AD	Attention to sale process and various emails with A&M regarding same	0.30	1,595.00	\$478.50
10/27/2023	PJL	AD	Attention to correspondence regarding updated Asset Purchase Agreement and review open issues.	0.20	1,295.00	\$259.00
10/30/2023	PJL	AD	Correspondence drafted to and reviewed from Debtors' counsel regarding Transaction Notice.	0.20	1,295.00	\$259.00
				<b>23.00</b>		<b>\$31,357.00</b>

#### Case Administration

10/02/2023	PJL	CA	Conference with B. Sandler regarding open issues on Cyxtera.	0.30	1,295.00	\$388.50
10/05/2023	PJL	CA	Review various settlements and other open issues.	0.90	1,295.00	\$1,165.50
10/09/2023	LSC	CA	Review docket and pleadings and prepare correspondence to attorneys outlining upcoming dates, deadlines, and issues and update WIP list.	1.00	545.00	\$545.00
10/16/2023	BJS	CA	Review critical dates and discuss with L. Canty	0.10	1,595.00	\$159.50
10/16/2023	LSC	CA	Review docket and pleadings and prepare correspondence to attorneys outlining upcoming dates, deadlines, and issues and update WIP list.	1.00	545.00	\$545.00

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/16/2023	PJL	CA	Attention to critical dates memo and amendments thereto.	0.20	1,295.00	\$259.00
10/23/2023	BJS	CA	Review critical dates and discuss with L.Canty	0.10	1,595.00	\$159.50
10/30/2023	LSC	CA	Review docket and pleadings and prepare correspondence to attorneys outlining upcoming dates, deadlines, and issues and update WIP list.	1.10	545.00	\$599.50
10/31/2023	BJS	CA	Review critical dates and discuss with L. Canty	0.10	1,595.00	\$159.50
10/31/2023	LSC	CA	Update critical dates memo and WIP list and circulate same.	0.50	545.00	\$272.50
				<b>5.30</b>		<b>\$4,253.50</b>

### PSZJ Compensation

10/03/2023	LSC	CP	Research and correspondence regarding billing issues.	0.40	545.00	\$218.00
10/10/2023	LSC	CP	Prepare and coordinate filing of CNO re PSZJ monthly fee statement.	0.30	545.00	\$163.50
10/25/2023	LSC	CP	Preparation of PSZJ's third monthly fee statement, coordinate filing of same, and serve same.	3.00	545.00	\$1,635.00
				<b>3.70</b>		<b>\$2,016.50</b>

### Other Professional Compensation

10/02/2023	BJS	CPO	Various emails with R Newman regarding M3	0.10	1,595.00	\$159.50
10/02/2023	BJS	CPO	Attention to Cole Schotz fee app	0.10	1,595.00	\$159.50
10/10/2023	LSC	CPO	Prepare and coordinate filing of CNO regarding A&M fee statement.	0.30	545.00	\$163.50
10/11/2023	BJS	CPO	Review A&M fee statement and various emails with L. Canty regarding same	0.10	1,595.00	\$159.50
10/11/2023	LSC	CPO	Finalize and coordinate filing of A&M's September monthly statement (.3); serve same (.3).	0.60	545.00	\$327.00
10/25/2023	BJS	CPO	Review Katten fee statement	0.10	1,595.00	\$159.50
10/25/2023	BJS	CPO	Review and revise PSZJ fee statement	0.30	1,595.00	\$478.50
10/25/2023	BJS	CPO	Review AP fee statement	0.10	1,595.00	\$159.50

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/25/2023	CRR	CPO	Review CNO re A&M and respond to A&M re filing.	0.30	1,095.00	\$328.50
10/26/2023	BJS	CPO	Review K&E fee statement	0.10	1,595.00	\$159.50
						<b>2.10</b>
						<b>\$2,254.50</b>

### **Financing/Cash Collateral/Cash Management**

09/02/2023	CHM	FN	Emails with B. Sandler re DIP issues list.	0.30	925.00	\$277.50
10/10/2023	BJS	FN	Review Greenberg Traurig fee statement	0.10	1,595.00	\$159.50
10/13/2023	BJS	FN	Review DIP report	0.20	1,595.00	\$319.00
10/17/2023	BJS	FN	Review Ryker fee statement	0.10	1,595.00	\$159.50
10/23/2023	BJS	FN	Review Greenberg Traurig fee statement	0.10	1,595.00	\$159.50
10/26/2023	BJS	FN	Attention to revised DIP budget	0.30	1,595.00	\$478.50
10/31/2023	BJS	FN	Review Gibsons fee statement	0.10	1,595.00	\$159.50
						<b>1.20</b>
						<b>\$1,713.00</b>

### **General Creditors' Committee**

10/20/2023	BJS	GC	Participate on Committee Call	0.60	1,595.00	\$957.00
10/20/2023	BJS	GC	Prepare for Committee call	0.20	1,595.00	\$319.00
10/20/2023	ECO	GC	Review e-mail and materials from Bradford Sandler ahead of Committee meeting.	0.10	725.00	\$72.50
10/20/2023	ECO	GC	Attend Committee meeting with PSZJ/A&M re business plan and strategy going forward.	0.60	725.00	\$435.00
10/20/2023	RJF	GC	Attend committee meeting.	0.60	1,695.00	\$1,017.00
						<b>2.10</b>
						<b>\$2,800.50</b>

### **Operations**

10/19/2023	BJS	OP	Various emails with M Johnson regarding stub rent	0.10	1,595.00	\$159.50
10/20/2023	BJS	OP	Various emails with Debtors regarding stub rent and various emails with A&M regarding same	0.20	1,595.00	\$319.00
10/20/2023	BJS	OP	Review monthly operating reports	0.20	1,595.00	\$319.00
						<b>0.50</b>
						<b>\$797.50</b>

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				<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Plan and Disclosure Statement</b>						
10/02/2023	BJS	PD	Various emails with A&M regarding releases	0.20	1,595.00	\$319.00
10/04/2023	BJS	PD	Attention to plan issues	0.30	1,595.00	\$478.50
10/06/2023	PJL	PD	Discussion with Debtors regarding Liquidating Trust Agreement.	0.30	1,295.00	\$388.50
10/06/2023	PJL	PD	Review plan/disclosure statement in preparation of drafting Liquidating Trust.	1.10	1,295.00	\$1,424.50
10/09/2023	BJS	PD	Attention to confirmation	0.20	1,595.00	\$319.00
10/09/2023	CRR	PD	Review re plan deadlines and filing of plan supplement and send to P. Labov.	0.40	1,095.00	\$438.00
10/10/2023	PJL	PD	Draft trust agreement.	3.80	1,295.00	\$4,921.00
10/11/2023	BJS	PD	Attention to plan issues	0.30	1,595.00	\$478.50
10/11/2023	BJS	PD	Attention to plan issues	0.30	1,595.00	\$478.50
10/11/2023	PJL	PD	Correspondence drafted to and reviewed from Peter D'Auria regarding guy trust agreement.	0.20	1,295.00	\$259.00
10/11/2023	PJL	PD	Review plan and disclosure statement, including Committee settlement and revisions to GUC Trust Agreement.	0.80	1,295.00	\$1,036.00
10/12/2023	BJS	PD	Review plan supplement	0.40	1,595.00	\$638.00
10/12/2023	PJL	PD	Draft Cyxtera GUC Trust Agreement.	3.60	1,295.00	\$4,662.00
10/12/2023	PJL	PD	Respond to email correspondence from Debtors' counsel.	0.10	1,295.00	\$129.50
10/13/2023	PJL	PD	Revisions to GUC Trust Agreement.	1.90	1,295.00	\$2,460.50
10/14/2023	BJS	PD	Attention to LT Agreement	0.50	1,595.00	\$797.50
10/16/2023	BJS	PD	Attention to plan issues	0.50	1,595.00	\$797.50
10/16/2023	PJL	PD	Attention to GUC Trust Agreement.	1.10	1,295.00	\$1,424.50
10/17/2023	BJS	PD	Attention to plan/confirmation issues	0.30	1,595.00	\$478.50
10/17/2023	PJL	PD	Review amendment to deadlines and speak to Debtors' counsel regarding same.	0.40	1,295.00	\$518.00
10/18/2023	PJL	PD	Review status of Cyxtera GUC Trust Agreement.	0.60	1,295.00	\$777.00

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10/19/2023	PJL	PD	Correspondence drafted to and reviewed from Debtors' counsel regarding GUC Trust Agreement.	0.40	1,295.00	\$518.00
10/20/2023	BJS	PD	Attention to confirmation issues	0.40	1,595.00	\$638.00
10/20/2023	BJS	PD	Review A&M report	0.40	1,595.00	\$638.00
10/20/2023	BJS	PD	Various emails with Committee regarding plan	0.10	1,595.00	\$159.50
10/23/2023	BJS	PD	Attention to plan issues and review plan supplement	1.00	1,595.00	\$1,595.00
10/25/2023	BJS	PD	Attention to plan issues	0.30	1,595.00	\$478.50
10/25/2023	PJL	PD	Review changes to GUC Trust Agreement by Debtors' counsel and attention to various emails regarding same.	0.80	1,295.00	\$1,036.00
10/26/2023	BJS	PD	Attention to confirmation hearing/plan issues	0.20	1,595.00	\$319.00
10/26/2023	PJL	PD	Review correspondence from Debtors' counsel and updated timing for plan related documents and timing for confirmation, including discussion with B. Sandler regarding same.	0.20	1,295.00	\$259.00
10/30/2023	BJS	PD	Attention to plan issues	0.50	1,595.00	\$797.50
10/30/2023	PJL	PD	Review changes to plan language.	0.40	1,295.00	\$518.00
10/31/2023	BJS	PD	Attention to plan issues	0.40	1,595.00	\$638.00
10/31/2023	BJS	PD	Various emails with Committee regarding update	0.40	1,595.00	\$638.00
10/31/2023	PJL	PD	Review new dates and discuss same internally.	0.30	1,295.00	\$388.50
				<b>23.10</b>		<b>\$31,844.50</b>

#### Other Professional Retention

10/04/2023	BJS	RPO	Review Katten declaration	0.10	1,595.00	\$159.50
				<b>0.10</b>		<b>\$159.50</b>

**TOTAL SERVICES FOR THIS MATTER:** **\$77,196.50**

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**Expenses**

10/11/2023	PO	Postage	42.81
10/25/2023	RE2	( 874 @0.10 PER PG)	87.40
10/31/2023	PAC	Pacer - Court Research	4.10
<b>Total Expenses for this Matter</b>			<b>\$134.31</b>

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**A/R STATEMENT**

<b>Outstanding Balance from prior invoices as of 10/31/2023</b>		<b>(May not include recent payments)</b>		
<b><u>A/R Bill Number</u></b>	<b><u>Invoice Date</u></b>	<b><u>Fee Billed</u></b>	<b><u>Expenses Billed</u></b>	<b><u>Balance Due</u></b>
133022	07/31/2023	\$86,501.30	\$0.00	\$86,501.30
133202	08/31/2023	\$61,867.30	\$0.00	\$61,867.30
134341	09/30/2023	\$183,700.00	\$692.88	\$184,392.88
<b>Total Amount Due on Current and Prior Invoices:</b>				<b>\$410,092.29</b>